

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

SHANNAH M. KURLAND, and	:	
GLADYS B. GOULD,	:	
Plaintiffs	:	
v.	:	C.A. No. 14-0524-WES-PAS
	:	
CITY OF PROVIDENCE, by and	:	
through its Treasurer, James J. Lombardi,	:	
III, alias, and OSCAR PEREZ, alias,	:	
JOHN DOE, and JOHN ROE, each	:	
individually and in their official capacities	:	
as police officers in the City of	:	
Providence Police Department, and	:	
HUGH T. CLEMENTS, JR., alias,	:	
individually and in his official capacity as	:	
Chief of the City of Providence Police	:	
Department,	:	
Defendants	:	

PLAINTIFFS' CROSS MOTION FOR PARTIAL SUMMARY JUDGMENT

Now come the Plaintiffs, Shannah Kurland and Gladys Gould, in the above-described matter and do hereby move this Court pursuant to Fed.R.Civ.P 56 and Lr. Cv. 56 for entry of partial summary judgment against the Defendants as to liability on all counts alleged in the Second Amended Complaint on the grounds that there is no dispute of material fact and that Plaintiffs are otherwise entitled to partial judgment as a matter of law. As further grounds therefore and in support thereof, Plaintiffs rely on their Combined Memorandum of Law in Support of their Motion for Partial Summary Judgment and Objection to the Defendants' Motion for Summary Judgment, Plaintiffs' Statement of Undisputed Facts in Support of their Motion for Partial Summary Judgment and of Additional Facts in Opposition to Defendants' Motion for Summary Judgment, and Record Appendix filed simultaneously herewith, as well as on such other pleadings and documents as may be referenced therein. Plaintiffs request a hearing on their motion.

WHEREFORE, Plaintiffs respectfully pray that this Court grant their within motion and enter partial summary judgment as to liability against the Defendants for the reasons and in the manner set forth in their Memorandum of Law.

Plaintiffs,
By their attorneys,

Date: April 3, 2019

/s/ Richard A. Sinapi
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CERTIFICATION

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I hereby certify that on **April 3, 2019**, a true copy of the within was filed electronically via the Court's CM/ECF System. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system and the filing is available for viewing and downloading from the court's cm/ecf system. Service on the counsel of record listed above has been effectuated by electronic means.

/s/ Richard A. Sinapi